Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Permit Number	Effective Date	Expiration Date
SWRO10538	August 16, 2005	August 15, 2010

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Webb Furniture Enterprises, Inc.
P.O. Box 1277
Galax, VA 24333
Registration No. 10538
County-Plant No. 51-640-00025

located at

Plant #2
South Main Street
Galax, VA 24333

in accordance with the Conditions of this permit.

Approved on August 16, 2005.

Robert G. Burnley
Director

Permit consists of 32 pages.
Permit Conditions 1 to 81.
Source Testing Report Format

Webb Furniture Enterprises, Inc. - Plant #2
Title V Operating Permit Table of Contents

PERMIT CONDITIONS - the regulatory reference and authority for each condition is listed in parentheses () after each condition.

Operate in Accordance with Permit

1. The permitted facility is to be operated in accordance with the terms of this permit. You are also advised that the conditions of the Department's NSR permit dated November 9, 2001 (as amended April 20, 2005) are still valid. This permit is subject to revocation prior to its expiration date if the permittee fails to comply with the terms and conditions of the permit, any applicable federal or state requirements as defined in 9 VAC 5 Chapter 80 Article 1 or any provisions of 9 VAC 5 Chapter 80 Article 1. Any physical change in, or change in the method of operation of, the stationary source subject to this permit may be subject to 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, or 9 VAC 5-80-50 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-260 and 9 VAC 5-80-190)

   Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

   a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
   b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
   c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
   d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
   e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
   f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
   g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B. and C.

   If there is any change made at the permitted facility which requires a new permit or a permit modification under 9 VAC 5-80-10, 9 VAC 5-80-1790, 9 VAC 5-80-30, it may be necessary to reopen this permit under 9 VAC 5-80-110 to ensure that applicable requirements continue to be met.
(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260.)

2. Equipment to be operated consists of:

Significant Emissions Units

Emission Unit ID	Emission Unit Description	Capacity/ Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
B-1A	Combustion Engineering Wood-fired boiler (1957)	19,240,000 Btu/hr	Barron Industries Multicyclone	Mc-1	N/A
B-1B B-1C	Combustion Engineering Coal/woodwaste-firing (secondary fuels)	19,240,000 Btu/hr	Barron Industries Multicyclone	Mc-1	N/A
B-2A	Erie City Iron Works Wood-fired boiler (1946)	19,240,000 Btu/hr	Barron Industries multicyclone	Mc-2	N/A
B-2B	Erie City Iron Works Woodwaste (secondary)	19,240,000 Btu/hr	Barron Industries multicyclone	Mc-2	N/A
Woodworking Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
WO(bh-1) (bh-2)	Woodworking	66,000 bd. ft./day total	Moldow Baghouses (vent internally)	Df-1 Df-2	N/A
(bh-3)			Torit-Day Baghouse	Df-3	N/A
Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
WO(bh-4)	Woodworking		Torit-Day Baghouse	Df-4	11/9/01 (as amended 4/20/05)
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
FR(sb-1)	Spray booths	142 gal/hr (total)	Filter	Sf-1	N/A
(sb-2)			Filter	Sf-2	N/A
(sb-3)			Filter	Sf-3	N/A
(sb-4)			Filter	Sf-4	N/A
(sb-5)			Filter	Sf-5	N/A
(sb-6)			Filter	Sf-6	N/A

Emission Unit ID	Emission Unit Description	Capacity/ Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
(sb-7)			Filter	Sf-7	N/A
(sb-8)			Filter	Sf-8	N/A
(sb-9)			Filter	Sf-9	N/A
Furniture Finishing Equipment		Subject to 9 VAC 5 Chapter 50 (New or Modified)			
(prnt-1)	3-Roll Grain Printer	2.25 lb/hr ink VOC capacity	None	N/A	11/9/01 (as amended 4/20/05)
Wood Drying Equipment		Subject to 9 VAC 5 Chapter 40 (Existing)			
LD(dk-1)	Lumber drying - Southeastern Installation	77,000 bd. ft. 5,621,000 bd ft/yr	None	N/A	N/A
LD(dk-2)	Lumber drying - Southeastern Installation	77,000 bd. ft. 5,621,000 bd ft/yr	None	N/A	N/A
LD(dk-3)	Lumber drying - Southeastern Installation	77,000 bd. ft. 5,621,000 bd ft/yr	None	N/A	N/A
LD(dk-4) (dk-5)	Lumber drying - Irvington Moore	44,000 bd. ft. x 2 6,424,000 bd ft/yr	None	N/A	N/A
Furniture Gluing Equipment		Subject to 9 VAC 5 Chapter 40 (Existing)			
GO	Operation	11,500 ft^2/hr total	None	N/A	N/A

Insignificant Emissions Units

The following emission units at the facility are identified in the application as being subject to 9 VAC 5-40-80 (visible emissions) and 9 VAC 5-40-260 (particulate process weight rate table), and are listed as insignificant emission units in 9 VAC 5-80-720 B:

Emission Unit ID	Emission Unit Description	Capacity/ Size	Applicable Requirement **
Insignificant equipment or activities			9 VAC 5-80-720 B
DG-1	Degreasing/Parts Cleaning	3.31 ft^2 parts washer	9 VAC 5-40-80 and 5-40-260

** Applicable requirements:
9 VAC 5-40-80 (visible emissions)
9 VAC 5-40-260 (particulate process weight rate table)

These emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Provided, however, that one or more of the emission units identified above shall be subject to monitoring, recordkeeping, and reporting requirements pursuant to 9 VAC 5-80-110 if, in the Director's determination, operation of the emission unit(s) indicates a failure to comply with 9 VAC 5-40-80 or 9 VAC 5-40-260. The Director shall permit revision proceedings in accordance with 9 VAC 5-80-190 through 9 VAC 5-80-240, as appropriate, to impose specific permit conditions upon such noncomplying emission unit(s).
(9 VAC 5-40-80, 9 VAC 5-40-260, 9 VAC 5-80-110 and 9 VAC 5 Chapter 80 Article 4)

Fuel Burning Conditions (B-1 and B-2)

Emission Control

3. Particulate emissions from the Combustion Engineering boiler (B-1) shall be controlled by a Barron Industries multicyclone with a rated control efficiency of 90 percent. Particulate emissions from the Erie City Iron Works boiler (B-2) shall be controlled by a Barron Industries multicyclone. The multicyclones shall be provided with adequate access for inspection. An annual inspection shall be conducted on the multicyclones by the permittee to insure structural integrity.
(9 VAC 5-80-110 C)

Limitations

4. The approved fuels for the Combustion Engineering boiler (B-1) are wood, coal and wood waste materials generated from the manufacturing processes of sources with SIC 2511. Approved fuels for the Erie City Iron Works boiler (B-2) are wood and wood waste. The permitted facility may switch from one of these approved fuels to another approved fuel without notification. A change to a fuel not listed above may require a permit modification.
(9 VAC-5-80-10 and 9 VAC 5-80-110 B)

5. Emissions from the operation of the Combustion Engineering (B-1) boiler shall not exceed the limits specified below:

Particulate Matter	0.42 lbs/10^6 Btu
Sulfur Dioxide	50.8 lbs/hr

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110 B)

6. Total emissions from the operation of the Erie City Iron Works (B-2) boiler shall not exceed the limits specified below:

Particulate Matter	0.42 lbs/10^6 Btu
Sulfur Dioxide	50.8 lbs/hr

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110 B)

7. Visible emissions from the Combustion Engineering and Erie City Iron Works boiler exhausts shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction. (9 VAC 5-40-80 and 9 VAC 5-80-110 K)

8. The stack exhaust elevation for the Erie City Iron Works boiler shall not be less than 35 feet. The stack shall have adequate access for inspection.
(9 VAC 5-80-1180, 9 VAC 5-80-110 B and condition 3 of NSR permit issued 11/9/2001 (as amended 4/20/2005))

Monitoring

9. Visible emissions checks shall be performed on the Combustion Engineering and Erie City Iron Works boiler stacks, for compliance with limits on visible emissions as specified in condition 7 above. Visible emissions checks shall be conducted at least weekly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these weekly observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If the six-minute average opacity exceeds 20%, the VEE shall be immediately continued for a total evaluation time of 18 minutes or procedures to correct the visible emission condition shall be taken immediately. The corrective action shall be followed by a six minute VEE in accordance with Method 9 to confirm compliance or 18 minutes if the opacity continues to be greater than the applicable limit. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 9. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. (9 VAC 5-40-20 and 9 VAC 5-80-110 K)

10. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-110 E of State Regulations, an emission test shall be conducted on the Erie City Iron Works boiler exhaust for particulate matter (in accordance with EPA methods) to determine compliance with the limit contained in condition 6 for the same. Results shall also serve as a wood-firing emission factor for calculations in condition 11 below. The test shall be performed once per permit term, within 120 days of permit issuance. Source emission tests shall be conducted and data reported in accordance with the Source Test Report Format attached to this permit, 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or Subpart listed in 9 VAC 5-50-410. The details of the source emission tests are to be arranged with the Director, Southwest Regional Office. Two (2) copies of the test results shall be submitted to the Southwest Regional Office within 60 days after test completion.
(9 VAC 5-80-110 K)

Recordkeeping

11. Emission monitoring and recordkeeping not otherwise required by this permit shall consist of the following fuel consumption and operating data:

a. Amount of coal and wood combusted in the coal and wood/woodwaste-fired boilers (B-1 and B-2) on a monthly and annual basis. Fuel consumption is calculated as the sum of each consecutive 12 month period.

b. Annual emissions calculations for the purpose of compliance certification with the terms of this permit, including emissions limitations. Hourly emissions shall be calculated by dividing the annual emissions calculated monthly as the sum of each consecutive 12 month period, by the annual hours of operation appropriate for the same period.

c. The number of hours of operation of the Combustion Engineering and Erie City Iron Works boilers firing each type of fuel.

d. Records (supplier fuel analysis) of all coal shipments purchased.

e. The DEQ-approved, pollutant-specific emission factors and the equations used to determine compliance with conditions 5 and 6. This shall also include the heat content of the wood fuel.

The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-40-50 and 9 VAC 5-80-110 F)

Woodworking Conditions (WO(bh-1) through WO(bh-4))

Emission Control

12. Particulate emissions from the woodworking equipment (WO(bh-1) through WO(bh-4)) shall be controlled by fabric filter baghouses. The baghouses shall be provided with adequate access for inspection and those outside shall be equipped with a device to continuously measure the differential pressure drop across the filter. The device shall be installed in an accessible location and shall be maintained by the permittee in proper working order and checked weekly, with readings noted in a log. (9 VAC 5-50-260, 9 VAC 5-80-110 K, 9 VAC 5-80-110 C and condition 4 of NSR permit issued 11/9/2001 (as amended 4/20/2005))

13. All subsequent transfer of the collected material from the Torit-Day model 156 RF10 baghouse shall be controlled by a completely enclosed transfer system.
(9 VAC 5-50-260, 9 VAC 5-80-110 C and condition 5 of NSR permit issued 11/9/2001 (as amended 4/20/2005))

14. Fugitive particulate emissions from the collection and transferring of collected wood waste shall be controlled by

a. Rotary air lock from the collector to an enclosed bin, and
b. Trucking and storing of woodwaste.
(9 VAC 5-40-90 and 9 VAC 5-80-110 C)

Limitations

15. Emissions from the operation of the woodworking equipment through exhausts from baghouses df-1 through df-3 shall not exceed the limit specified below:

    Particulate Matter 0.05 gr/dscf

    Compliance with these limits shall be determined as stated in Condition 17, or as demonstrated by performance test.
    (9 VAC 5-40-2270 B, 9 VAC 5-50-10 D and 9 VAC 5-80-110 B)

16. Emissions from the exhaust from baghouse df-4 shall not exceed the limits specified below:

    Particulate Matter 0.01 gr/dscf

    The lbs/hr and tons/yr emissions are derived from the estimated overall emission contribution. Compliance with these limits shall be determined as stated in Condition 17, or as demonstrated by performance test.
    (9 VAC 5-50-260, 9 VAC 5-80-110 B and condition 7 of NSR permit issued 11/9/2001 (as amended 4/20/2005))

17. Visible emissions from the operation of the woodworking equipment through exhausts from baghouses df-1 through df-3, and any fugitive emission points, shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except for one six-minute period in any hour of not more than 60% opacity. This condition applies at all times except during startup, shutdown and malfunction.
    (9 VAC 5-40-2280 and 9 VAC 5-80-110 K)

18. Visible emissions from the exhausts from baghouse df-4 shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
    (9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110 K and condition 8 of NSR permit issued 11/9/2001 (as amended 4/20/2005))

Monitoring

19. Visible emissions checks shall be performed on all baghouse exhausts and fugitive emissions points, except for df-1 and df-2, for compliance with limits on visible emissions as specified in conditions 17 and 18 above. Visible checks shall be conducted at least weekly for df-3 and fugitive emissions points, and daily for df-4, during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these noted observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If the six-minute average opacity exceeds 20% for df-3, 10% for fugitive emissions points, or 5% for baghouse df-4; the Method 9 evaluation shall be immediately continued for a total evaluation time of 18 minutes, or procedures to correct the visible emission condition shall be taken immediately. The corrective action shall be followed by a six minute VEE in accordance with Method 9 or 18 minutes if the opacity continues to be greated than the applicable limit. A record of

each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 9. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. If excess emissions are expected for more than one hour, DEQ malfunction procedures shall be implemented.
(9 VAC 5-40-20, 9 VAC 5-50-20, and 9 VAC 5-80-110 K)

20. The permittee shall monitor, operate, calibrate and maintain baghouses df-3 and df-4 controlling woodworking operations according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
Daily visible emissions checks for df-4 and weekly for df-3, per condition 19, with results recorded daily and weekly, respectively.	Check for presence of visible emissions.	Instantaneous observation of visible emission.
Method 9 visible emissions evaluations per condition 19, when triggered by observation of visible emissions.	Conduct visible emissions evaluation in accordance with 40 CFR 60, Appendix A, Method 9. Performed by certified observer.	Opacity is less than or equal to 20% for df-3, and opacity is less than or equal to 5% for df-4.
Weekly external baghouse inspections with weekly pressure drop recordings.	External baghouse inspection by a qualified employee with at least one year of experience in maintenance of mechanical equipment.	Indicator range consists of pressure drops above 1" water column and below 6" water column.
Annual internal baghouse inspections or when indicated by pressure drop.	Internal baghouse inspection by a qualified employee with at least one year of experience in maintenance of mechanical equipment.	Air flow restrictions affecting proper operation of baghouse.

21. The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.
(9 VAC 5-80-490 E and 40 CFR 64.6 (c))

22. At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
(9 VAC 5-80-490 E and 40 CFR 64.7 (b))

23. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the baghouses are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of

compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.
(9 VAC 5-80-490 E and 40 CFR 64.7 (c))

24. Upon detecting an excursion or exceedance, the permittee shall restore operation of the baghouse to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.
(9 VAC 5-80-490 E and 40 CFR 64.7 (d)(1))

25. Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
(9 VAC 5-80-490 E and 40 CFR 64.7 (d)(2))

26. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Southwest Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters
(9 VAC 5-80-490 E and 40 CFR 64.7 (e))

27. If the number of exceedances or excursion exceeds 5 percent duration of the operating time for the baghouse for a reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:

    a. Improved preventative maintenance practices;

    b. Process operation changes;

c. Appropriate improvements to control methods;

d. Other steps appropriate to correct control performance; and

e. More frequent or improved monitoring.

(9 VAC 5-80-490 E and 40 CFR 64.8(a) and (b))

Wood Drying (Kilns) Conditions

Limitations

28. Visible emissions from the wood drying equipment (LD(dk-1) through (dk-5)) shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60% opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-40-80 and 9 VAC 5-80-110 K)

Monitoring

29. A visible emissions check shall be performed on all wood drying kiln operations, for compliance with limits on visible emissions as specified in condition 28 above. Visible checks shall be conducted at least monthly during periods of normal facility operation for a sufficient time interval, not less than two months, to determine if there are any visible emissions. Checks may be discontinued if none are observed. If visible emissions are observed during these observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If the six-minute average opacity exceeds 20%, the VEE shall be immediately continued for a total evaluation time of 18 minutes or procedures to correct the visible emission condition shall be taken immediately. The corrective action shall be followed by a six minute VEE in accordance with Method 9 to confirm compliance or 18 minutes if the opacity continues to be greater than 20%. A record of each visible emissions evaluation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 9. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. If excess emissions are expected for more than one hour, DEQ malfunction procedures shall be implemented.
(9 VAC 5-40-20 and 9 VAC 5-80-110 K)

Furniture Finishing Conditions

Limitations

30. Emissions from the application of wipe stains shall not exceed the limits specified below:

Particulate Matter	12.6 lb/hr
PM-10	12.6 lb/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

31. Emissions from the application of miscellaneous stains shall not exceed the limits specified below:

Particulate Matter	12.6 lb/hr
PM-10	12.6 lb/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

32. Emissions from the application of wash coat and sealer shall not exceed the limits specified below:

Particulate Matter	12.6 lb/hr
PM-10	12.6 lb/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

33. Emissions from the application of lacquer shall not exceed the limits specified below:

Particulate Matter	12.6 lb/hr
PM-10	12.6 lb/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

34. Visible emissions from the spray booth exhausts shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except for one six-minute period in any hour of not more than 60% opacity. This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-40-80 and 9 VAC 5-80-110 K)

35. The throughput and emissions of volatile organic compounds (VOC) in the 3-roll grain printer shall not exceed 2.25 lb/hr and 9.86 tons/yr, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-1180, 9 VAC 5-80-110 B and condition 6 of NSR permit dated 11/9/2001 (as amended 4/20/2005))

Monitoring

36. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-100.E of State Regulations, visible emissions checks shall be performed on the spray booth exhausts, for compliance with limits on visible emissions as specified in condition 34 above. Visible checks shall be conducted at least daily during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these daily observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9, shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If the six-minute average opacity exceeds 20%, the VEE shall be immediately continued for a total evaluation time of 18 minutes or procedures to correct the visible emission condition shall be taken immediately. The corrective action shall be followed by a six minute VEE in accordance with Method 9 to confirm compliance or 18 minutes if the opacity continues to be greater than the applicable limit. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 9. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the

results of the observation, and the name of the observer.

(9 VAC 5-50-20 and 9 VAC 5-80-110 K)

Recordkeeping

37. Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

    a. A monthly and annual material balance including the throughput and emissons of particulate matter. Annual throughput shall be calculated as the sum of each consecutive 12 month period. Hourly emissions shall be calculated by dividing by the monthly operating hours for booths spraying each type of material limited in conditions 30 through 33 above.
    b. The annual throughput and emissions of VOC in the 3-roll printer, calculated monthly as the sum of each consecutive 12 month period.

    The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
    (9 VAC 5-80-110 F and condition 9 of NSR permit dated 11/9/2001 (as amended 4/20/2005))

Furniture Gluing Conditions (GO)

Limitations

38. Emissions from the operation of the glue application systems shall not exceed the limits specified below:

Particulate Matter	12.6 lb/hr
PM-10	12.6 lb/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110 B)

39. Visible emissions from the glue application exhausts shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except for one six-minute period in any hour of not more than 60% opacity. This condition applies at all times except during startup, shutdown and malfunction.
    (9 VAC 5-40-80 and 9 VAC 5-80-110 K)

Monitoring

40. A visible emissions check shall be performed on all glue application exhausts, for compliance with limits on visible emissions as specified in condition 39 above. Visible checks shall be conducted at least weekly during periods of normal facility operation for a sufficient time interval, not less than two months, to determine if there are any visible emissions. Checks may be discontinued if none are observed. If visible emissions are observed during these observations, or at any other time, visible emissions evaluations (VEEs) in accordance with 40 CFR 60 Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If the six-minute average opacity exceeds 20%, the VEE shall be immediately continued for a total evaluation time of 18 minutes or procedures to correct the visible emission condition shall be taken immediately. The corrective action shall be followed by a six minute VEE in accordance with Method 9 to confirm compliance or 18 minutes if the opacity continues to be greater than 20%. A record of each

visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 9. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. (9 VAC 5-40-20 and 9 VAC 5-80-110 K)

Recordkeeping

41. Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

    The annual throughput of wood in square feet through the glue room hot press, calculated monthly as the sum of each consecutive 12 month period. Annual hours of operation of the press and calculation of the average hourly throughput for the same period.

    The content of and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.) (9 VAC 5-80-110 F)

MACT Conditions

42. Except as specified in this permit, the facility is to be operated in compliance with Federal requirements under 40 CFR part 63, subpart JJ, and subpart A as identified in Table 1 for subpart JJ. (9 VAC 5-170-160, 40 CFR 63.800 and 40 CFR 63 Subpart A)

Emission Standard

43. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits;

    a. For finishing operations use any of the following methods;

        i. Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids as applied;

        ii. Use compliant finishing materials that meet the following specifications:

            (1) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids as applied;

            (2) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

            (3) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by (5) of this sub- section;

(4) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids as applied;

(5) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;

iii. Use any combination of averaging, compliant coatings, and control device such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;

b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;

c. For contact adhesive operations use either of the following methods;

i. Compliant contact adhesives shall be used based on the following criteria;

(1) For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;

(2) For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids as applied;

(3) For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids as applied;

(9 VAC 5-170-160 and 40 CFR 63.802)

Initial Compliance

44. Initial compliance with the VHAP emissions limits shall be determined as follows:
(See Conditions 50 and 51 for content and timing of report submissions and signature requirements)

a. For finishing operations when compliant finishing materials are being used to show initial compliance, the permittee shall submit an initial compliance status report stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 43, are being used by the facility.

b. For finishing operations when compliant finishing materials are being used to show initial compliance and the finishing materials are being applied using continuous coaters, the permittee shall:

i. Submit an initial compliance status report stating that compliant finishing materials, as determined by the VHAP content of the finishing material in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

ii. Submit an initial compliance status report stating that compliant finishing materials, as determined by the VHAP content of the finishing material in the reservoir, are being used; the viscosity of the finishing material in the reservoir is being monitored; and compliant thinners are being used. The permittee shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

c. For finishing operations any of the following compliance methods may be used: 1) an averaging approach, as in Condition a above; 2) compliant coatings, as in Condition b; or 3) a combination of these methods.

d. For contact adhesive operations when compliant adhesives are being used to show initial compliance the permittee shall submit an initial compliance status report stating that compliant adhesives as stated in Condition 43 are being used.

e. For strippable spray booth coatings the permittee shall submit an initial compliance status report stating that compliant strippable spray booth coatings as stated in Condition 43 are being used by the affected source.

f. For work practice standards, in Condition 48, the permittee shall submit an initial compliance status report stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(9 VAC 5-170-160 and 40 CFR 63.804.(f) & 40 CFR 63.804 (a)-(e))

Continuous Compliance

45. Continuous compliance with the VHAP emissions limits shall be determined as follows:
(See Condition 50 and 51 for content and timing of report submissions and signature requirements)

a. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition 43, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

b. For finishing operations when compliant coatings are being used to show continuous compliance and the coatings are being applied using continuous coaters the permittee shall demonstrate continuous compliance by either of the following:

i. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, use compliant thinners, and submit a compliance certification with the semiannual report which states that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The facility is in violation of

the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

ii. Use compliant coatings, as determined by the VHAP content of the coating in the reservoir, use compliant thinners, maintain a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintain records of solvent additions, and submit a compliance certification with the semiannual report which states that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. The facility is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit, as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

c. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

d. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the Administrator may require the permittee to modify the plan (see Condition 48.a.)

(9 VAC 5-170-160 and 40 CFR 63.804.(g) & 40 CFR 63.8)

Copies of written notification referenced in items a and b should also be sent to the Southwest Regional Office.
(9 VAC 5-170-160 and 40 CFR 63.9(e) & (g))

Submittals

46. All submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the Southwest Regional Office and to EPA Region III at the following address:

U.S. EPA Region III
Air Protection Division (3AP00)
ATTN.: Wood Furniture NESHAP Coordinator
1650 Arch Street

Philadelphia, PA 19103-2029

(9 VAC 5-170-160 and 40 CFR 63.13)

Operation and Maintenance

47. The permittee shall meet the following operation and maintenance requirements:

a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

b. Malfunctions shall be corrected as soon as practicable after their occurrence.

c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-170-160 and 40 CFR 63.6(e))

Work Practice Standards

48. The permittee shall develop and implement the following work practice standards:

a. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in §63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

i. A list of all current personnel by name and job description that are required to be trained;

ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

ii. An inspection schedule;

iii. Methods for documenting the date and results of each inspection and any repairs that were made;

iv. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(1 A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(2 Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:

i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of Subpart JJ;

ii. The number of pieces washed off, and the reason for the washoff; and

iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.

f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

ii. For touchup and repair under the following conditions:

(1 The touchup and repair occurs after completion of the finishing operation; or

(2 The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

iv. When emissions from the finishing application station are directed to a control device;

v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasiblity by submitting to the Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasiblity. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasiblity:

(1 The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(2 The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

k. Washoff operations - The permittee shall control emissions from washoff operations by:

i. Using normally closed tanks for washoff; and

ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

i. Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations;

ii. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by §63.803 (l)(2). For VHAPs that do not have a baseline, one will be established according to Condition vi. below.

iii. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.

iv. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the Southwest Regional Office and/or the Administrator that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(1 The exceedance is no more than 15.0 percent above the baseline level;
(2 Usage of the VHAP is below the de minimis level presented in Table 5 for that VHAP;
(3 The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(4 The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

v. If none of the explanations listed in Condition iv. above are the reason for the increase, the permittee shall confer with the Southwest Regional Office and/or the Administrator to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the Southwest Regional Office and/or the Administrator and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

vi. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the Southwest Regional Office and/or the Administrator that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition iv. above, the affected source shall follow the procedures established in Condition v. above.

(9 VAC 5-170-160 and 40 CFR 63.803(a)-(l))

Recordkeeping

49. The permittee shall maintain records of the following:

a. For emission limit purposes the permittee shall maintain the following:

i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ,

ii. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and

iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.

b. Following the continuous coating operations, where viscosity is being used to determine compliance, the permittee shall maintain the records required by Condition a. above as well as the following:

i. Solvent and coating additions to the continuous coater reservoir;

ii. Viscosity measurements; and

iii. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

c. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

i. Records demonstrating that the operator training program required by Condition 48.b. is in place;

ii. Records collected in accordance with the inspection and maintenance plan required by Condition 48.c.;

iii. Records associated with the cleaning solvent accounting system required by Condition 48.d.;

iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition 48.h.;

v. Records associated with the formulation assessment plan required by Condition 48.l.; and

vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

d. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.

e. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.

f. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-170-160 and 40 CFR 63.806 & 63.10(b)(1))

Notification of Compliance

50. Each time a notification of compliance status is required, the permittee shall submit to the Southwest Regional Office and/or the Administrator a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

    a. The methods that were used to determine compliance;

    b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

    c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

    d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;

    e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);

    f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

    g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

    (9 VAC 5-170-160 and 40 CFR 63.9(h))

Reporting

51. Reporting not otherwise required by this permit shall consist of the following:

    a. The permittee when demonstrating initial compliance shall submit the compliance status report required by §63.9(h) and Condition 50 no later than 60 days after the compliance date. The report shall include the information required by Condition 44.

    b. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

        i. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

        ii. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

iii. The semiannual reports shall include the information required by Condition 45, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

iv. The frequency of the reports required by Condition b. above shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

c. The permittee, when required to provide a written notification by Condition 48.l.iv. for exceedance of a baseline level [§63.803(l)(4)], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

(9 VAC 5-170-160 and 40 CFR 63.807 & 63.10(d))

Other Conditions

Visible Emission Standard

52. Unless otherwise specified in this permit, visible emissions from the any emission unit at this facility shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except for one six-minute period in any hour of not more than 60% opacity. This condition applies at all times except during startup, shutdown and malfunction. The details of the tests are to be arranged with the Director, Southwest Regional Office.
(9 VAC 5-40-80 and 9 VAC 5-80-110 A)

Fugitive Dust/Emission Standard

53. During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.
(9 VAC 5-40-90 and 9 VAC 5-80-110 A)

Emission Tests

54. Upon request of the Department, the permittee shall conduct emission tests in accordance with procedures approved by the Department and provide, or cause to be provided, emission testing facilities as follows:

- Sampling ports adequate for test methods applicable to such source.
- Safe sampling platforms.
- Safe access to sampling platforms.
- Utilities for sampling and testing equipment.

Sampling ports, platforms and safe access shall be provided at the following locations:

- Combustion Engineering and Erie City Iron Works boiler stacks

(9 VAC 5-40-30 F)

General Conditions

Circumvention

55. No owner or other person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air pollutants emitted, conceals or dilutes an emission of air pollutants which would otherwise violate State Regulations. Such concealment includes, but is not limited to, 1) the use of gaseous diluents to achieve compliance with a visible emissions standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, or 2) the piecemeal carrying-out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size. This section does not prohibit the construction of a stack.
(9 VAC 5-20-70)

Startup, Shutdown and Malfunction

56. At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination that acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-40-20 E and 9 VAC 5-50-20 E)

Duty to Supplement or Correct Application

57. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. An applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E and 9 VAC 5-80-110 M)

Submissions Certification

58. Any application form, report, compliance certification, or other document required to be submitted to the DEQ shall be signed by a responsible official.
(9 VAC 5-80-80 G and 9 VAC 5-80-110 K)

Permit Duration and Application Shield

59. This permit shall become invalid five years from the date of issuance, which is noted on Page 1 of this permit. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.
(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

Severability

60. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G)

Duty to Comply

61. The permittee shall comply with all conditions of the permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
(9 VAC 5-80-110 G and 9 VAC 5-80-260 A)

Need to Halt or Reduce Activity Not a Defense

62. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G)

Permit Action for Cause

63. The permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

a. This permit will be reopened and revised by the DEQ prior to expiration due to the following causes:

   i. If additional applicable federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire.

   ii. If the Board or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

   iii. If the Administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

   iv. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date of this permit.

b. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

c. Reopenings shall not be initiated before a notice of such intent is provided to the source by the Board at least 30 days in advance of the date that the permit is to be reopened, except that the Board may provide a shorter time period in the case of an emergency.

d. If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit pursuant to 9 VAC 5-80-240 A, the Administrator shall notify the Board and the permittee of such finding in writing. Following such notification the procedures as listed in 9 VAC 5-80-240 D shall be followed.

e. A permit may be revoked or terminated prior to its expiration date if the owner does any of the following:

i. Knowingly makes material misstatements in the permit application or any amendments thereto.

ii. Violates, fails, neglects or refuses to comply with (i) the terms or conditions of the permit, (ii) any applicable requirements, or (iii) the applicable provisions of Rule 8-5.

The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination stated above for any other violations of the regulations.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260)

Property Rights

64. The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G)

Duty to Submit Information

65. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G)

Duty to Pay Permit Fees

66. The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

Emissions Trading

67. No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.
(9 VAC 5-80-110 I)

Inspection and Entry Requirements

68. Upon presentation of credentials and other documents as may be required by law, the owner shall allow the Board to perform the following:

a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K, 9 VAC 5-80-260 E, and 9 VAC 5-170-130)

Compliance Schedule

69. The permittee shall comply with the compliance schedule as follows:

a. For applicable requirements with which the source is in compliance the permittee will continue to comply with such requirements.

b. For applicable requirements that will become effective during the permit term the permittee will meet such requirements on a timely basis.

(9 VAC 5-80-110 K and 9 VAC 5-80-90 I)

Annual Compliance Certification

70. Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit, including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

a. The time period included in the certification. The time period to be addressed is January 1 to December 31.

b. The identification of each term or condition of the permit that is the basis of the certification.

c. The compliance status.

d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of noncompliance.

e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

f. Such other facts as the permit may require to determine the compliance status of the source.

g. One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K)

Federal Enforceability

71. All terms and conditions in this permit are enforceable by the Administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

Accidental Release Prevention

72. If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Stratospheric Ozone Protection

73. If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Permit Shield

74. The permit shield provides that:

a. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements in effect as of the date of permit issuance and as specifically identified in the permit. The permit shield shall cover only the applicable requirements that are covered by terms and conditions of the permit, and

b. Nothing in 9 VAC 5-80-140 or in this permit shall alter or affect the following:
   i. The provisions of § 303 of the federal Clean Air Act (emergency orders), including the authority of the Administrator under that section.

   ii. The liability of an owner for any violation of applicable requirements prior to or at the time of permit issuance.

   iii. The ability to obtain information from a source by the (1) Administrator pursuant to § 114 of the federal Clean Air Act (inspections, monitoring, and entry); (2) Board pursuant to § 10.1-1314 or § 10.1-1315 of the Virginia Air Pollution Control Law; or (3) department pursuant to § 10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

Transfer of Permit

75. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

Changes to Permit

76. Changes to emissions units that pertain to applicable federal requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 B through D and 9 VAC 5-80-200 through 9 VAC 5-80-240. Changes to emissions units that pertain to applicable state requirements at a source with a permit issued shall be made as specified under 9 VAC 5-80-190 E.
(9 VAC 5-80-190 A)

Malfunction as an affirmative defense

77. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

e. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

f. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250 and 9 VAC 5-20-180 C)

Permit Deviation Reporting

78. The permittee shall notify the Director, Southwest Regional Office, within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventive measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report required by condition 80.b. or in the certification of compliance with permit terms and conditions pursuant to condition 70 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

Failure/Malfunction Reporting

79. In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime businesss hours after the malfunction is discovered, notify the Director, Southwest Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Southwest Regional Office.
(9 VAC 5-20-180 C)

Semiannual Reporting

80. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31, and

b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

   i. Exceedance of emissions limitations or operational restrictions;

   ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

   iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

Permit on Site

81. Within five days after receipt of the issued permit, the applicant shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

Summary - Permitted Equipment, Terms, and Conditions

Emission Unit ID	Pollutant Emitted	Emissions Limit / Work Practice Standard	Regulations	Control Equipment or Method Conditions	Testing Requirement Conditions	Monitoring Requirement Conditions	Record-keeping Requirement Conditions	Reporting Requirement Conditions
Fuel Burning Equipment								
B-1A B-1B B-1C	PM SO_2 Visible emissions	0.42 lb/10^6 Btu 50.8 lb/hr 20% opacity	9 VAC 5-40-900 9 VAC 5-40-930 9 VAC 5-40-80 9 VAC 5-80-110 B	Barron Ind. Multicyclone (mc-1)		Condition 9 and 11	Conditions 9 and 11	Conditions 70, 78, 79 and 80
B-2A B-2B	PM SO_2 Visible emissions	0.42 lb/10^6 Btu 50.8 lb/hr 20% opacity	9 VAC 5-40-900 9 VAC 5-40-930 9 VAC 5-40-80 9 VAC 5-80-110 B	Barron Ind. Multicyclone (mc-2)	Condition 10	Conditions 9, 10 and 11	Conditions 9, 10 and 11	Conditions 10, 70, 78, 79 and 80
Woodworking Operations								
WO(bh-1) (bh-2)	PM Visible emissions	0.05 gr/dscf 20% opacity	9 VAC 5-40-2270 B 9 VAC 5-40-2280 9 VAC 5-50-10 D 9 VAC 5-80-110 B	Moldow baghouses df-1 and df-2		Condition 12	Condition 12	Conditions 70, 78, 79 and 80
WO(bh-3)	PM	0.05 gr/dscf 20% opacity	9 VAC 5-40-2270 B 9 VAC 5-40-2280 9 VAC 5-50-10 D 9 VAC 5-80-110 B 40 CFR 64.7 - 40 CFR 64.9 (CAM)	Torit-Day baghouse df-3		Conditions 12 and 19-27	Conditions 12 and 19-27	Conditions 70, 78, 79 and 80

Emission Unit ID	Pollutant Emitted	Emissions Limit / Work Practice Standard	Regulations	Control Equipment or Method Conditions	Testing Requirement Conditions	Monitoring Requirement Conditions	Record-keeping Requirement Conditions	Reporting Requirement Conditions
WO(bh-4)	PM Visible emissions	0.01 gr/dscf 5% opacity 10% opacity for fugitives	9 VAC 5-50-260 9 VAC 5-80-110 B 9 VAC 5-170-160 9 VAC 5-50-20 9 VAC 5-80-110 K 40 CFR 64.7 - 40 CFR 64.9 (CAM) NSR permit issued 11/9/01 (as amended 3/ /05)	Torit-Day Baghouse df-4		Conditions 12 and 19-27	Conditions 12 and 19-27	Conditions 70, 78, 79 and 80
Furniture Finishing Operations								
FR(sb-1) thru (sb-9) Roll Grain Printer	PM PM-10 Visible emissions VOC	12.6 lb/hr each for application of wipe stains, miscellaneous stains, lacquer, and wash coat and sealer 20% opacity 1.3 lb/hr 0.42 tons/yr Consumption of ink limited to 500 gallons per year for printer.	9 VAC 5-40-260 9 VAC 5-40-80 9 VAC 5-80-110 B 9 VAC 5-80-110 K NSR permit issued 11/9/01 (as amended 3/ /05)	Filters		Conditions 36 and 37	Conditions 36 and 37	Conditions 70, 78, 79 and 80
Wood Drying (Kiln) Operations								
LD(dk-1) thru (dk-5)	Visible Emissions	20% opacity	9 VAC 5-40-20 9 VAC 5-40-80 9 VAC 5-80-110 K			Condition 29	Condition 29	Conditions 70, 78, 79 and 80
Furniture Gluing Operations								
GO	PM PM-10 Visible emissions	12.6 lb/hr for the hot press	9 VAC 5-40-260 9 VAC 5-40-80 9 VAC 5-80-110 B 9 VAC 5-80-110 K			Conditions 40 and 41	Conditions 40 and 41	Conditions 70, 78, 79 and 80

Emission Unit ID	Pollutant Emitted	Emissions Limit / Work Practice Standard	Regulations	Control Equipment or Method Conditions	Testing Requirement Conditions	Monitoring Requirement Conditions	Record-keeping Requirement Conditions	Reporting Requirement Conditions
Facility-wide MACT Conditions								
	Volatile HAPs (VHAPs)	Use compliant coatings and contact adhesives < 1.0 lb VHAPs/lb solids and Thinner < 10% HAPs	40 CFR 63 Subpart JJ and 40 CFR 63 Subpart A			Conditions 44, 45 and 48	Conditions 40, 45, 48 and 49	Conditions 44, 45, 46, 50, 51, 70, 78, 79 and 80
Insignificant Equipment or Activities								
DG-1	Visible Emissions	9 VAC 5-40-80 9 VAC 5-40-260						

SOURCE TESTING REPORT FORMAT

Cover
1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Tester; name, address and report date

Certification
1. Signed by team leader / certified observer (include certification date)
* 2. Signed by reviewer

Introduction
1. Test purpose
2. Test location, type of process
3. Test dates
* 4. Pollutants tested
5. Test methods used
6. Observers' names (industry and agency)
7. Any other important background information

Summary of Results
1. Pollutant emission results / visible emissions summary
2. Input during test vs. rated capacity
3. Allowable emissions
* 4. Description of collected samples, to include audits when applicable
5. Discussion of errors, both real and apparent

Source Operation
1. Description of process and control devices
2. Process and control equipment flow diagram
3. Process and control equipment data

* Sampling and Analysis Procedures
1. Sampling port location and dimensioned cross section
2. Sampling point description
3. Sampling train description
4. Brief description of sampling procedures with discussion of deviations from standard methods
5. Brief description of analytical procedures with discussion of deviation from standard methods

Appendix
* 1. Process data and emission results example calculations
2. Raw field data
* 3. Laboratory reports
4. Raw production data
* 5. Calibration procedures and results
6. Project participants and titles
7. Related correspondence
8. Standard procedures

* Not applicable to visible emission evaluations.

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